

November 14, 2005

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COMMISSION

Elizabeth O'Donnell
Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
Frankfort, Kentucky 40602

RE: Case No. 2005-oo398, Enrique Espinosa v. Louisville Gas and
Electric Company

Dear Ms. O'Donnell:

Enclosed please find an original and four (4) copies of my answers
to "Louisville Gas and Electric Company's Interrogatories and
Requests for production of documents to Enrique Espinosa".

Respectfully submitted,


Enrique Espinosa

cc: Ms. Elizabeth L. Cocanougher

ANSWERS TO LOUISVILLE GAS AND ELECTRIC COMPANY'S INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO ENRIQUE ESPINOSA

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1. (a) The photograph of Complaint (Enclosure 3) truly depicts the gas meter located at 6104 Orion Road, Louisville, KY 40222. This is an American Company meter with identification numbers Manf 425 532871. Witness (Wt): Enrique Espinosa (EE)
(b) To my best recollection this photograph was taken in May 2005 to show that the meter had not been painted except for the factory finish. Wt: EE.
(c) The original print was sent to the Commission. I did not keep another print or negative. Wt: EE.
2. When I stayed in my Orion residence in cold weather, I set my thermostat at 60°F and supplemented the heating using a 55,000 BTU wood burning stove (Woodsman). During warmer weather, the thermostat was kept in off setting and the furnace pilot was turned off. Wt: EE.
3. There are 3 gas heating furnaces in my Orion home but only one has been used for several years while the other two have been kept off. The manufacturer is General Electric Company, Trenton, NJ. The furnace in use has a model number BGLU166C2a01, and the unused furnaces: BGLU133C2B01 and BGLU166C2A01. Wt: EE.
4. The furnace in use is serviced by my son Luis Espinosa who has 20 years experience as Apartments maintenance technician and property manager. Wt: EE.
5. There is only one 40 gallons water heater: Reliance 501, Model 540, approximately eight years old. Wt: EE
6. There is no pool at 6104 Orion Road. Wt: EE
7. There is an electric operated sauna in the basement but it has not been used since I bought the house in 1988. Wt: EE.